CES Environmental Services, Inc. (As of March 20, 2015)

The EPA mobilized to the Site on September 3, 2014 and began addressing the wastes and spills located on site.

As of March 20, 2015, the EPA Team has addressed the following:

Vacuum Boxes (original): Wastes contained in the original 11 vacuum boxes have been transferred into shippable vacuum boxes and off-site for disposal (Trustee addressed 1 of these vacuum boxes). All original vacuum box containers have been removed from the site (Trustee approved their contractor, C4 Environmental, to obtain these boxes for the price of cleaning the boxes and providing them with cleaning certificates)

Roll-Off Boxes (original): Wastes contained in the original 2 roll-off boxes have been disposed (Trustee addressed 1 roll-off box). All original roll-off boxes have been removed from the site (Trustee approved their contractor, C4 Environmental, to obtain these boxes for the price of cleaning the boxes and providing them with cleaning certificates)

Frac Tanks (original): Waste removed from 9 of 12 frac tanks (3 of 12 were originally empty). Four (4) of the emptied frac tanks that were originally rented by CES Environmental Services during their operations were released back to those rental companies (1 to Dynamic Rental Systems, 4 to Dana Transport). The remaining frac tanks will remain on-site for anticipated cleanup operation waste storage (4 CES, 3 Dana Transport).

Aboveground Storage Tanks (ASTs): Liquids and sludge have been removed from 19 of 20 Steel ASTs. One (1) Steel AST (ST1) and three (3) Poly Tanks (PT1,PT2,PT3) remain to be addressed. The last Steel AST contains an oily acid liquid/sludge and is in the process of being emptied. Liquids have been removed into Totes the sludge will have to be placed into drums (labor intensive operation). The three (3) Poly Tanks will be addressed along with similar waste streams located within drums/totes/miscellaneous containers.

Waste Water Treatment Tanks (WWTT): Liquids and sludge have been removed from 16 of 20 WWTTs. The remaining tanks consist of one tank containing lime slurry, two tanks containing acid, and one tank containing neutral liquid. All tanks except the lime tank will be handled with the drums/totes/misc container bulking operations. The lime tank will be removed either into vacuum box or roll-off box. Prior to beginning Waste Water Tank removal, the secondary containment required liquid and solid removal. The secondary containment is substantially complete but additional and periodic cleaning will be necessary due to rainfall into the building as well as drips/leaks from cleanup operations.

Totes/Drums/Vats/Misc Containers: Empty containers have been segregated for cleaning (pressure washing). Full/Partially Full containers have been sampled, field characterized and currently being segregated into appropriate waste streams to be bulked, sampled, and properly containerized for disposal. There are approximately 8 poly tanks, 2 Vats, and 150 totes/drums with materials to be addressed. Additionally, there are approximately 166 RCRA empty totes/drums to be addressed.

Removal of Contaminated Sediments/Solids: General cleaning of visibly contaminated areas causing sheens on storm water has been completed. The cleaning of stained areas will continue to the extent possible but is not a high priority unless it is or possibly could cause a sheen on the storm water. Silt barriers and oil absorbent boom are in place to reduce sediment and hydrocarbon releases to storm water drains during a rain event.

Loading Bays (Main Warehouse): The bays and warehouse trenches have been substantially cleared of debris and chemical wastes to the extent possible. Additional work will be necessary.

Truck Cleaning Bay: The bays have been cleaned and sludge substantially removed from trenches leading to sump. This area will be used for container cleaning activities, as necessary.

Storm Water Management: This activity continues as rainfall occurs. Storm water is being allowed to drain from the site through silt barriers and absorbent boom. The southern portion of the facility currently remains diked which disrupts cleanup operations after a rain event. The site is usually inundated with storm water during a rain event. A one inch rainfall adds approximately 180,000 gallons of water on the facility where approximately 60000 gallons drains to the northern portion of the facility and 120,000 drains to the southern portion of the facility where it is currently diked. Eventually, the diked area will be opened up to allow normal storm water runoff to occur albeit through silt barriers and absorbent boom. The City of Houston has assisted EPA in allowing it to discharge the original accumulated and contaminated storm water into the City of Houston sanitary sewer and this option currently remains an option for questionable storm water issues should the need arise.

Waste Piles (Southern Portion of Facility): Trustee removed wastes dumped to the ground in March 2014 due to the theft of 7 roll-off boxes. An additional debris pile exists that is associated with the construction of the berm around the southern portion of the facility.

Lab Chemicals/Company Profile Samples: Trustee consolidated and disposed;

Bulk Process Chemicals: Trustee collected and disposed;

Items that Remain to be completed:

1. Wastewater Treatment Tank Area
   Sludge Removal: LIME
   Acid Removal: R02, PT6
   Liquid Removal: R01
   Piping: Remove Materials
   Secondary Containment: Final Cleanup

2. Aboveground Storage Tank Area
   Liquid/Sludge Removal: ST1
   Acid Removal: PT1, PT2
   Liquid Removal: PT3
   Piping: Remove Materials
   Secondary Containment: Remove contaminated Sand and Final Cleanup

3. Frac Tank Waste Disposal
   FT30335
   FT1001
   Contact Dana Transport and Have Them Pick up FT's

4. Bulk Poly Tanks, Totes, Vats, Drums, Misc Containers, Carbon, Supersacks and clean/cut up Empties (8 Poly Tanks, 9 Totes, and 31 Drums along with approximately 10 empty totes remain to be completed)

5. Remove Material (Liquids/Solids) form Large VAT South of ASTs

6. Place large pipe with valve out the South Pond Area for Storm Water Drainage;

7. Main Warehouse
   Chop Saw Piping in Trench and Remove Trench Solids
   Clean Contaminated Solids from Warehouse Floor
   Tanker Trailer: Clean solids out

8. Truck Wash Bay, Shed, Former Shed:
   Truck Wash Bay: Remove Liquids/Solids and from Sump and Trenches and Final Clean
   Shed: Remove Liquids/Solids from Sump and Drains and Final Clean
   Former Shed: Remove Liquids/Solids from Sumps and Trenches and Final Clean

9. Dispose of Containerized Wastes (vac boxes, fracs, rolloffs)

Roll-off Boxes:

Number	Status
OT 25563	Sand Trench Residue
OT 25480	Cut up Totes and Drums
OT 25319	Debris (ADS Hose, Wood,Pails, Plastic, PPE)
OT 25134	Debris (Pails, PPE, Wood)
OT 25337	Empty Drums, Totes

Vacuum Boxes:

Number	Status
VB 25242	Empty Cleaned Deodorized by Veolia
VB 25229	Empty Cleaned Deodorized by Veolia
VB 25226	Sludge S T 3, S T 5, S T 7
VB 25302	Sludge N T 3, N T 5, N T 6, S T 8 N OT 8
VB 25287	N OT 7, N OT 8
VB 25333	N OT 8
VB 25281	N OT 8
VB 25343	N OT 8
VBDW 25196	N OT 8
VB 2501	ST 6
VB 25206	FT1004 Oily Material
VB 25274	FT 1004 Oily Material

VB 2564	T-108
VB 25203	T1, T 11, T 3
VB 25315	T-7, T-8, T11, T 10, T 9, T 4
VB 25146	FT 1001, FT 215012, WMU 123
VBDW 25147	Sludge from Group 24, 25, 26, and 27

Frac Tanks:

Number	**Status**
FT 1004	Empty - Residual Sludge
FT 1002	Empty - Sludge Removed
FT 1001	Receiving the Drum/Tote Liquids
FT 5180	Empty-Sludge Removed
FT 215012	Empty-Residual Sludge
FT 30335	Full
FT 33527	Empty-Residual Sludge

EPA Removal Costs (3/18/15): $ 1,333,063 (estimated)